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Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administered)

**STIPULATION CONTINUING  
HEARING AND EXTENDING  
BRIEFING DEADLINES WITH  
RESPECT TO THE MOTION BY  
THE CITY AND COUNTY OF SAN  
FRANCISCO TO ALLOW LATE  
FILING OF PROOF OF CLAIM AND  
RELATED RELIEF**

Related to Dkt. No. 9782

Current Hearing Date: January 12, 2021  
Time: 10:00 am

PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and reorganized debtors (collectively, the “**Debtors**” or “**Reorganized Debtors**”) in the above-captioned cases (the “**Chapter 11 Cases**”), on the one hand, and the City and County of San Francisco (“**CCSF**”, and, together with the Debtors and Reorganized Debtors, the “**Parties**”), on the other hand, by and through their respective counsel, hereby stipulate and agree as follows:

### RECITALS

A. On January 29, 2019 (the “**Petition Date**”), the Debtors commenced these Chapter 11 Cases in the United States Bankruptcy Court for the Northern District of California (the “**Bankruptcy Court**”).

B. On December 10, 2020, CCSF filed the *Motion by the City and County of San Francisco to Allow Late Filing of Proof of Claim and for Related Relief* [Dkt. No. 9782] (the “**Motion**”). The Motion is set for hearing on January 12, 2021 (the “**Hearing**”). See Dkt. No. 9784.

C. The Parties are attempting to resolve their issues regarding the Motion consensually, and have agreed to continue the Hearing and extend the briefing deadlines in order to provide additional time to facilitate such potential resolution.

**NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE BANKRUPTCY COURT TO ORDER, THAT:**

1. The time for the Reorganized Debtors to submit any response to the Motion shall be extended to January 13, 2021.

2. The time for CCSF to submit any reply in furtherance of the Motion shall be extended to January 20, 2021.

3. The Hearing shall be continued to January 27, 2021 at 10:00 a.m. (Pacific Time).

4. This Stipulation may be executed in counterparts, each of which shall be deemed an original but all of which together shall constitute one and the same agreement.

1           5.       The Bankruptcy Court shall retain jurisdiction to resolve any disputes or  
2 controversies arising from this Stipulation or any Order approving the terms of this Stipulation.

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4       Dated: December 21, 2020

      Dated: December 21, 2020

5       WEIL, GOTSHAL & MANGES LLP  
6       KELLER BENVENUTTI KIM LLP

      GREENE RADOVSKY MALONEY  
      SHARE & HENNIGH LLP

7       /s/ Peter J. Benvenutti

/s/ Edward J. Tredinnick

8       Peter J. Benvenutti

      Edward J. Tredinnick

9       *Attorneys for Debtors*  
10       *and Reorganized Debtors*

*Attorneys for the City and County of San*  
      *Francisco*

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